

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: WORLD TRADE CENTER DISASTER SITE
LITIGATION

Docket No.: 21MC100 (AKH)

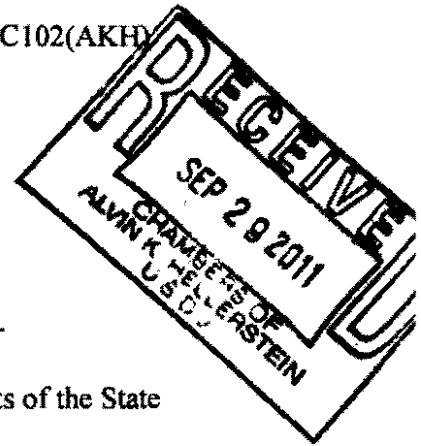
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IN RE: WORLD TRADE CENTER LOWER MANHATTAN
DISASTER SITE LITIGATION

Docket No.: 21MC102(AKH)

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IN RE: COMBINED WORLD TRADE CENTER AND
LOWER MANHATTAN DISASTER SITE LITIGATION

Docket No.: 21MC102(AKH)

**DECLARATION OF DENISE A. RUBIN IN OPPOSITION
TO DEFENDANT CITY OF NEW YORK AND ITS
CONTRACTORS' MOTION FOR STAY OF EXECUTION
OF THE SEPTEMBER 8, 2011 ORDER PENDING APPEAL.**



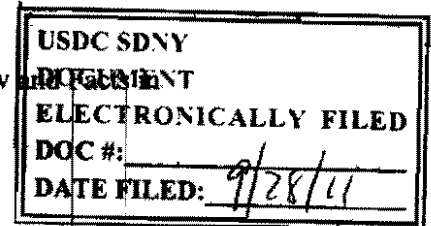
DENISE A. RUBIN, an Attorney duly licensed to practice before the Courts of the State of New York and a Member of the Bar of this Honorable Court, hereby Declares as follows:

1. I am associated with the law firm Worby Groner Edelman & Napoli Bern, LLP and offer this Declaration in Opposition to the Defendant City of New York and its contractors' motion to stay execution of this Court's September 8, 2011 Order pending appeal.

2. I have reviewed the Affidavit of Christine LaSala in Support of the Motion for Stay Pending Appeal, as well as the Memorandum Of Law filed therewith, the relevant statutory and case law on the stay issue.

3. Plaintiffs respectfully offer the annexed Memorandum of Law in Opposition to the Stay Application.

Dated: New York, New York
September 26, 2011



Denise Rubin
Denise A. Rubin (DR5591)

*Plaintiffs' objection, which I received after issuing my
indorsed order of 9/28/11, is over-ruled. I accept the repre-
sentation of Christine LaSala that funds will be segregated in
amount equivalent to the bond obligation of the WTC Corporate to
assure against any prejudice to plaintiffs. There is no risk of prejudice
to plaintiffs. 9/28/11 (2:45 pm)
Al K. Hellerstein*

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DISASTER SITE LITIGATION

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IN RE: COMBINED WORLD TRADE CENTER AND Docket No.: 21MC102(AKH)
LOWER MANHATTAN DISASTER SITE LITIGATION
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Denise A. Rubin, an Attorney duly licensed to practice before the Courts of the State of New York and a member of the Bar of this Honorable Court, hereby declares the following under penalty of perjury:

I am associated with the law firm Worby Groner Edelman & Napoli Bern, LLP and as such represent the plaintiffs in the within actions. On September 26, 2011, I duly served a true copy of the within PLAINTIFFS' OPPOSITION TO STAY MOTION on the persons listed below by e-mail and via this Court's ECF system.

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Denise A. Rubin (DR 5591)